

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

HLV, LLC, et al.,

Plaintiffs,

v.

1:13cv1366PLM

Hon. Paul L. Maloney

VAN BUREN COUNTY, et al.,

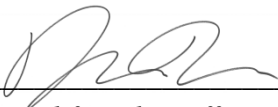
Defendants.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE**  
**THEIR SUPPLEMENT IN OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**  
**FOR THE COURT TO JUDICIALLY NOTICE NEW FACTS**

Plaintiffs, by their counsel, incorporate their Brief in Support, and request that pursuant to Fed. R. Civ. P. Rule 7 (b)(1) and Fed. R. Evid. Rule 201(b) this Court grant their Motion for Leave to File Their Supplement in Opposition to Defendants' Motion to Dismiss and to Judicially Notice New Facts, which are relevant to Defendant Bedford and Defendant Stewart's motions to dismiss.

WHEREFORE, Plaintiffs, HLV, LLC, Landworthy Container, LLC and Robert Baker respectfully request that the Court enter an order stating that Plaintiffs may file a supplement in opposition to Defendants' motions to dismiss and that the Court takes judicial notice of said facts.

Dated: June 4, 2015

  
\_\_\_\_\_  
*Counsel for Plaintiffs*  
Derek S. Witte (P68329)  
Jordan C. Hoyer (P75659)  
TALCOTT FRANKLIN P.C.  
Trust Building  
40 Pearl Street NW, Suite 922  
Grand Rapids, Michigan 49503  
(616) 350-9924